

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Trademark Holder Identified in Exhibit 1,)	Case No.:22-cv-1354
)	
Plaintiff,)	
v.)	Judge: Honorable Jorge L. Alonso
)	
Does 1-337, As Identified in Exhibit 2,)	
)	
Defendants.)	Magistrate: Honorable Jeffrey T. Gilbert
)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff files this Motion requesting leave to file the following documents under seal: (1) Plaintiff's Complaint Exhibits 2 (defendant list) and 4 (seller defense example); (2) Plaintiff's Motion for Entry of an *Ex Parte* Temporary Restraining Order including all of its exhibits such as screenshot printouts showing the active Defendant Internet Store infringing listings (Exhibit 2 to the Declaration of Avraham Goldstein in the Motion for Entry of an *Ex Parte* Temporary Restraining Order); and, finally, (3) should the Court grant Plaintiff's Motion for Entry of an *Ex Parte* Temporary Restraining Order, that Order should be sealed as well.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act.

Due to the nature of the infringing activities, sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying

law and would interfere with this Court's power to grant relief. We have actually seen this kind of activity before involving this very same Plaintiff and this forms the basis for our request to seal for a limited period.

Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents and add the enjoined defendants to the public docket.

Dated: March 24, 2022

Respectfully submitted,

By: _____ /s/ Rishi Nair
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